Message

From: Cirian, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98D0FD2CBB3F4F25B819C6929E18D08D-CIRIAN, MIKE]

Sent: 4/4/2018 3:01:27 PM

To: Gunnar Emilsson [EmilssonGR@cdmsmith.com]

Subject: Re: CRAC RI, phase 2 SAP

I went ahead and sent them on. So you don't need to worry about it.

Mike

Sent from my iPhone

On Apr 4, 2018, at 8:38 AM, Emilsson, Gunnar < EmilssonGR@cdmsmith.com wrote:

Will do, Mike. I am at training in Boston right now, but should be able to getc it done tomorrow afternoon.

Sent from my Verizon 4G LTE smartphone

----- Original message -----

From: "Cirian, Mike" < Cirian. Mike@epa.gov>

Date: 4/4/18 10:30 AM (GMT-05:00)

To: "Emilsson, Gunnar" < EmilssonGR@cdmsmith.com>

Subject: RE: CRAC RI, phase 2 SAP

Hello Gunnar,

Would you please add these to our comments and send them to Mike Ritorto and Roux. I let Brian Sanchez and David Berry have until 4/12/18 to provide comments. I want to get the other comments out so Roux can start to implement them.

Thanks, Mike

Mike Cirian, PE Libby On-site Project Manager US EPA 108 East 9th Street Libby, MT 59923 (406) 293-6194 Office

From: Sloan, Richard [mailto:RSloan@mt.gov]
Sent: Wednesday, April 4, 2018 8:09 AM

To: Gunnar Emilsson < EmilssonGR@cdmsmith.com >

Cc: Cirian, Mike < Cirian.Mike@epa.gov>; Stoops, Thomas < TStoops@mt.gov>; Owen, Colleen

<<u>COwen@mt.gov</u>>; Morris, Katie <<u>Katie.Morris@mt.gov</u>>

Subject: CRAC RI, phase 2 SAP

Gunner,

The DEQ has reviewed the Phase II site Characterization Sampling and Analysis Plan, dated February 28, 2918 and the CDM comments, dated April 2, 2028, on the Plan.

The DEQ generally agrees with the CDM comments on the proposed phase II SAP, with the following specific emphasis:

Section 6.3.1, page 40 defined the basis for the RIFS.

The main objectives of phase II are to generate the data needed for the risk assessments and to generate the data for evaluation of remedial action options.

Section 4.2, pages 16-17 well defines the specific tasks involved in phase II.

The extensive RI, phase I data base should allow significant screening of COPCs and COPECs with final screening as part of the risk assessments when the phase II data is available.

It is understood that all monitoring wells (old and New) will be sampled twice as part of phase II.

Section 4.6 describes the installation of seven new monitoring wells. The DEQ recommends two additional wells to better define potential impacts on the western residential area (one midway between MW-057 and MW-059 and one 700 feet North of MW-057); the DEQ recommends three additional wells to better define the nature and extent of the cyanide/fluoride plume (one midway between MW-045 and MW-047, one 500 feet West of MW-054, and one 500 feet Northeast of MW-037). Thus 12 new wells (seven recommended by ROUX and five recommended by DEQ) would be installed, developed, and sampled.

Please combine this specific emphasis with CDM/EPA's comments for joint EPA/DEQ comments to ROUX/CFAC.

Pleasee contact me if you have any questions or comments.

Thank you.

Dick Sloan

Richard Sloan Senior Environmental Project Manager Montana Department of Environmental Quality 1225 Cedar Street Helena, Mt 59601 406-431-2582